

Cornell-Dubilier Electronics Superfund Site  
OU1 – Vicinity Properties  
Draft Response to Agency Comments on the Draft Phase 2 Data Characterization Report  
W912DQ-08-D-0017, TO 0023

Master Comment No.	Reviewer Comment No.	Comment Author	Agency	Document Section	Page	Comment	Louis Berger Response
1	1	A. Mason	USACE-KCD			Include an OU1 ROW Area Overview Figure like Sheet 1 - OU1 ROW Investigation Area for the ROW proposed sampling locations.	This figure is being developed and will be included as a design-sized drawing.
2	2	A. Mason	USACE-KCD			Include a site overview figure showing the OU2 site and the surrounding neighborhoods and labeling the properties that were sampled as part of Phase 2 activities with their respective property numbers.	This figure is being developed and will be included as a design-sized drawing.
3	3		USACE-KCD			Include a copy of the field books/notes from the Phase 2 sampling event as an Appendix to this report	Document will be revised as requested.
4	4		USACE-KCD			Include a copy of the surveyor's report as an Appendix to this report	Document will be revised as requested.
5	5	A. Mason	USACE-KCD			Include an Acronyms and Abbreviations list after the Table of Contents	Document will be revised as requested.
6	6	A. Mason	USACE-KCD	All tables		The text discusses the data in ppm to be consistent with the ROD, but the tables present the data as ug/kg. Convert the data in the tables to ppm (i.e., mg/kg) to be consistent with the text.	The data tables in the Phase 1 Data Characterization also present the data as ug/kg. In order to maintain consistency with this document, we recommend leaving the data presentation as it stands: as mg/kg in the text and on the figures, and as ug/kg in the tables.
7	7	A. Mason	USACE-KCD	TOC	v	Include Figure 1 - Former CDE Facility Location Map in the List of Figures	Document will be revised as requested.
8	8	A. Mason	USACE-KCD	TOC	v	The Sheet Numbers and Titles on the ROW figures do not match what is listed in the List of Figures. Please revise so they match.	Document will be revised as requested.
9	9	A. Mason	USACE-KCD	TOC	vii	The ROW Table numbers should be ROW-x not RW-x in order to match the titles on the tables	Document will be revised as requested.
10	10	A. Mason	USACE-KCD	TOC	vii	Capitalize ROW in the title for ROW Area 1	Document will be revised as requested.

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11	11	A. Mason	USACE-KCD	TOC	vii-viii	List of tables is inconsistent in treatment of placeholder table pages. In some cases (i.e., 204-2) a table was included even though there currently is no data because it has not been received from the lab. In other cases (i.e., Table 112-2) the table was not included in the List of Tables even though it too had a flysheet indicating the data had not yet been received from the lab.	Comment noted. This is strictly a draft report issue. The final report will contain all validated data, and therefore there will not be any need for flysheets to serve as “missing data” placeholders.
12	12	A. Mason	USACE-KCD	1	1-1	First paragraph, first sentence: change reference from Table 1 to Figure 1	Document will be revised as requested.
13	13	A. Mason	USACE-KCD	1	1-1	Third paragraph, last sentence: reference is included for USEPA, 2004; however, there is no reference with this date in Section 5. There is a reference to USEPA, 2003 in Section 5. Revise to the appropriate date.	Document will be revised as requested.
14	79	K. Maas	USACE-KCD	1	1-2	Prior to Phase 2 sampling, EPA did defined four property categories based on previous investigations. There are also other properties not addressed or grouped into one of the four categories yet that have one or more results exceeding the ROD cleanup level. These properties require further technical evaluation but aren't identified anywhere. How should these other properties be documented in the RD?	The Phase 2 Data Characterization Report is intended to present findings from sampling performed during 2011; only those properties sampled are addressed. Other properties that have not been addressed in this Phase 2 report will need to be categorized at a future date; additional categories may need to be defined depending on EPA/KCD decisions on how to proceed with these properties. If it is desired to categorize those properties at this time, it is recommended that the list of properties be reviewed during a conference call and they be included in the Addendum that is expected to include the last round of ROW data (the “unused samples” data set).

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15	14	A. Mason	USACE-KCD	1	1-3	Include an explanatory bullet under the Confirmatory Properties similar to what was included for the Tier II and III properties.	Document will be revised as requested.
16	80	A. Darpinian	USACE-KCD	1.1	1-3 to 1-8	The summary of previous investigations and remedial actions is confusing to the reader. If this information has already been presented in another report, I recommend citing that report for this level of detail. If more recent information has been gained since the other report, that data could be presented here.	Each sub-section in this section of the report represents a brief summary of a historical report where complete details are presented; references to those historical reports is provided whenever available. This section presents a quick overview of the work done at the site to date. This section is identical to that presented in the Phase 1 data report, with the exception that a summary of the Phase 1 work itself and the USEPA cleaning (2010 efforts) based on that work have been added.  These summaries are divided into two categories: investigations performed and remedial actions performed. We recommend that this structure of this section be maintained and that all of the information be included so that the reader can see the progression of sampling and remediation at the site. Greater detail can be obtained by the reader from the referenced reports.
17	15	A. Mason	USACE-KCD	3	3-1	Third paragraph, last sentence: this sentence discusses that a surveyor collected locational data and refers to the tables but there is no locational data included in any of the tables.	The surveyor collected locational data after sampling was complete, and that data is presented on the figures. The specified sentence will be corrected to reference the Figures rather than the Tables.

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18	16	A. Mason	USACE-KCD	3.3.1	3-3	Sample locations, second paragraph. Were deep samples really collected from the 24 to 30-inch depth intervals? We thought deep samples were to be collected from the 18 to 24-inch depth interval.	Yes. In accordance with the planning documents, the 24 to 30-inch depth interval was the target for the deep samples. If refusal was encountered prior to reaching that depth, the deep sample was collected from the 18 to 24-inch interval, if attainable. We are currently exploring the sampling inconsistency between the Phase 1 deep sample collection and the Phase 2 deep sample collection; both Phase 1 and Phase 2 planning documents indicate a prescribed 24-30-inch depth interval.
19	17	A. Mason	USACE-KCD	3.3.1	3-3	ROW Area Boring Locations, first paragraph, second to last sentence; reference is made to plates described above. Where is the description of the plates?	The statement “(described above)” was intended to serve as a reference to the ROW figures and will be changed to “(see Figures ROW-1 through ROW-8).”
20	18	A. Mason	USACE-KCD	3.3.2	3-4	Second paragraph, last sentences says locations for ROW samples are shown on Tables RW-1 through RW-8. Change reference to say Figures ROW-1 through ROW-8 or to say data for the samples is contained in Tables ROW-1 through ROW-8.	Document will be revised to reference the figures.
21	19	A. Mason	USACE-KCD	3.3.2	3-4	Third paragraph, last sentence; "individual" is used twice in this sentence. Delete the second occurrence of the word.	Document will be revised as requested.
22	20	A. Mason	USACE-KCD	3.3.2	3-4	Fourth paragraph, last sentence says sample locations are shown on Tables 201 through 307. Change reference to say Figures 201 through 307 or to say data for the samples is contained in Tables 201 through 307.	Document will be revised as to reference the figures.
23	21	A. Mason	USACE-KCD	3.3.2	3-4	Fifth paragraph. Recommend moving this paragraph after paragraph 3 to keep the 0-6" discussion together.	Document will be revised as requested.

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24	22	A. Mason	USACE-KCD	3.4.5	3-8	First sentence on page 3-8; delete the first occurrence of "shipment"	Document will be revised as requested.
25	23	A. Mason	USACE-KCD	3.5	3-8	Reference is included for USEPA, 2004; however, there is no reference with this date in Section 5. There is a reference to USEPA, 2003 in Section 5. Revise to the appropriate date.	This references applies to the Contract Laboratory Program Guidance for Field Samplers. This document was revised in 2011, so the correct reference for this location should be "USEPA, 2011." The reference in the text will be corrected, and the target reference document will be added to the references section.
26	81	A. Darpinian	USACE-KCD	3.6	3-8	Please include EPA's validation reports as an attachment. Change text regarding validators - they are not the CLP laboratories but EPA contractors. Include text summarizing the results of the validation: were data rejected? Estimated? Were detection limits adequate? etc.	EPA's validation reports will be included as an attachment, and the text regarding the validators will be revised as requested.  It was specifically requested by the USEPA and the USACE-KCD that this data report be modeled after that submitted after Phase 1 sampling. That report did not include a summary of the results of data validation. However, a general summary of overall data validation will be added to Section 3.6.
27	24	A. Mason	USACE-KCD	4	4-1	Include date ranges for ROW sampling and Property sampling to give a sense of how long the overall field event lasted (i.e. ROW sampling at the eight ROW areas was completed between Month Day and Month Day. Soil samples were collected from XX properties between Month Day and Month Day. Interior dust sampling was completed at XX properties between Month Day and Month Day).	Document will be revised as requested.

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28	25	A. Mason	USACE-KCD	4.1.1 - 4.1.8		When bulleting out sample locations that exceeded the ROD criteria, include the concentration at each location in parenthesis after the sample location name.	Document will be revised as requested.
29	26	A. Mason	USACE-KCD	4.1.1	4-3	Second paragraph says sample locations are shown on Figure RW1. Change reference to say Figures RW1-1A through RW1-1D.	Document will be revised as requested.
30	27	A. Mason	USACE-KCD	4.1.1	4-3	Second paragraph; change table reference to Table ROW-1.	Document will be revised as requested.
31	28	A. Mason	USACE-KCD	4.1.2	4-3	Third paragraph says sample locations are shown on Figure RW2. Change reference to say Figures RW2-1A and RW2-1B.	Document will be revised as requested.
32	29	A. Mason	USACE-KCD	4.1.2	4-3	Third paragraph; change table reference to Table ROW-2.	Document will be revised as requested.
33	30	A. Mason	USACE-KCD	4.1.2	4-3	The write-up for section 4.1.1 and 4.1.2 need to be consistent. Section 4.1.1 bulleted out the sample locations with ROD exceedances but 4.1.2 bulleted out the locations that were below the ROD. All data sections should include a bulleted list of locations with ROD exceedances with the concentrations in parenthesis.	Document will be revised as requested.
34	31	A. Mason	USACE-KCD	4.1.3	4-5	Second paragraph says sample locations are shown on Figure RW3. Change reference to say Figures RW3-1A through RW3-1C.	Document will be revised as requested.
35	32	A. Mason	USACE-KCD	4.1.3	4-5	Second paragraph; change table reference to Table ROW-3.	Document will be revised as requested.
36	33	A. Mason	USACE-KCD	4.1.4	4-5	Third paragraph, change reference to say Figure RW4-1A.	Document will be revised as requested.
37	34	A. Mason	USACE-KCD	4.1.4	4-5	Third paragraph; change table reference to Table ROW-4.	Document will be revised as requested.

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38	35	A. Mason	USACE-KCD	4.1.5	4-6	Second paragraph, change reference to say Figures RW5-1A through RW5-1C.	Document will be revised as requested.
39	36	A. Mason	USACE-KCD	4.1.5	4-6	Second paragraph; change table reference to Table ROW-5.	Document will be revised as requested.
40	37	A. Mason	USACE-KCD	4.1.6	4-6	Third paragraph, change reference to say Figures RW6-1A and RW6-1B.	Document will be revised as requested.
41	38	A. Mason	USACE-KCD	4.1.6	4-6	Third paragraph; change table reference to Table ROW-6.	Document will be revised as requested.
42	39	A. Mason	USACE-KCD	4.1.7	4-7	Third paragraph, change reference to say Figure RW7-1A.	Document will be revised as requested.
43	40	A. Mason	USACE-KCD	4.1.7	4-7	Third paragraph; change table reference to Table ROW-7.	Document will be revised as requested.
44	41	A. Mason	USACE-KCD	4.1.8	4-7	Third paragraph, change reference to say Figure RW8-1A.	Document will be revised as requested.
45	42	A. Mason	USACE-KCD	4.1.8	4-7	Third paragraph; change table reference to Table ROW-8.	Document will be revised as requested.
46	43	A. Mason	USACE-KCD	4.3		General comment: To be consistent with Section 4.1 and make the data easier to find within the text, please bullet out the samples with exceedances and include the concentrations in parentheses.	Document will be revised as requested.
47	44	A. Mason	USACE-KCD	4.3.1	4-9	Soil Sampling, Fourth paragraph; change concentration at 201-01D to 0.0198 ppm.	Data has been presented consistently with four significant figures. We recommend leaving this result as 0.020 to remain consistent.
48	45	A. Mason	USACE-KCD	4.3.1	4-9	Soil Sampling, Fourth paragraph; Last sentence is incomplete.	The specified text will be reviewed and revised as appropriate.
49	46	A. Mason	USACE-KCD	4.3.1	4-9	Interior Dust Sampling; clarify that dust samples not identified by EPA because no dwelling was present on the property.	Document will be revised as requested.

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50	47	A. Mason	USACE-KCD	4.3.3	4-11	Interior Dust Sampling; clarify that no dust samples obtained because property owner did not grant access for interior sampling, not because EPA did not identify property for dust sampling.	Section 4.3.3 discusses Property 203. Based on information received from USEPA, this property was not identified for interior dust sampling because examination of aerial photographs of the property showed that no dwelling was present. The text will be clarified to reflect that no dwelling was present.
51	48	A. Mason	USACE-KCD	4.3.13	4-19	Soil Sampling, first paragraph: based on other property write-ups it appears the first sentence and half of the second sentence are missing.	The specified text will be reviewed and revised as appropriate.
52	49	A. Mason	USACE-KCD	4.3.13	4-20	Interior Dust Sampling; clarify that dust samples not identified by EPA because no dwelling was present on the property.	Document will be revised as requested.
53	50	A. Mason	USACE-KCD	4.3.16	4-21	Second Paragraph, bulleted list: include concentrations in parentheses after each sample location with a ROD exceedance	Document will be revised as requested.
54	51	A. Mason	USACE-KCD	4.3.17	4-22	Interior Dust Sampling; clarify that no dust samples obtained because property owner rescinded access for interior sampling, not because EPA did not identify property for dust sampling.	Section 4.3.17 discusses Property 217. EPA did identify the property for interior dust sampling. However, during the initial access process, the owner granted access to sample for soil, but not for dust.
55	52	A. Mason	USACE-KCD	4.3.19	4-24	Third Paragraph, bulleted list: include concentrations in parentheses after each sample location with a ROD exceedance	Document will be revised as requested.
56	53	A. Mason	USACE-KCD	4.3.20	4-25	Third Paragraph, bulleted list: include concentrations in parentheses after each sample location with a ROD exceedance	Document will be revised as requested.
57	54	A. Mason	USACE-KCD	4.3.23	4-27	Second Paragraph, bulleted list: include concentrations in parentheses after each sample location with a ROD exceedance	Document will be revised as requested.



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58	55	A. Mason	USACE-KCD	4.3.26	4-29	First Paragraph, bulleted list: include concentrations in parentheses after each sample location with a ROD exceedance	Document will be revised as requested.
59	56	A. Mason	USACE-KCD	4.3.26	4-29	Second paragraph: include concentrations for all deep samples that exceeded ROD criteria.	Document will be revised as requested.
60	57	A. Mason	USACE-KCD	4.3.26	4-29	Interior Dust Sampling; clarify that dust samples not identified by EPA because no dwelling was present on the property.	Document will be revised as requested.
61	58	A. Mason	USACE-KCD	4.3.27	4-30	Third paragraph, shallow soil results: The sample from boring 227-14S was not ND, it was NA due to rejected data; therefore, the minimum result detected would be 0.027 ppm in 227-08S	Document will be revised as requested.
62	59	A. Mason	USACE-KCD	4.3.27	4-30	Interior Dust Sampling; clarify that dust samples not identified by EPA because no dwelling was present on the property.	Document will be revised as requested.
63	60	A. Mason	USACE-KCD	4.3.29	4-31	Interior Dust Sampling; clarify that dust samples not identified by EPA because no dwelling was present on the property.	Document will be revised as requested.
64	61	A. Mason	USACE-KCD	4.4.2	4-33	Soil Sampling, Third paragraph: bullet out sample locations where ROD criteria was exceeded and include concentrations in parentheses	Document will be revised as requested.
65	62	A. Mason	USACE-KCD	4.4.3	4-35	Interior Dust Sampling: clarify that dust samples not collected because property owner only gave access for soil sampling but did not grant access for interior dust sampling.	Section 4.4.3 discusses Property 303. The owner did grant access to sample this property for interior dust. However, this property was ultimately not sampled for dust based on field recon performed by the EPA RPM and Louis Berger which found that room size constraints would not allow for the collection of adequate sample volume for analysis.
66	63	A. Mason	USACE-KCD	4.4.4	4-36	Second paragraph: include concentrations for samples that exceeded ROD criteria.	Document will be revised as requested.

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67	64	A. Mason	USACE-KCD	4.4.4	4-36	Interior Dust Sampling; clarify that dust samples not identified by EPA because no dwelling was present on the property.	Document will be revised as requested.
68	65	A. Mason	USACE-KCD	4.5	4-38	Include the number of additional samples left that were collected during the August 12 sampling event.	Document will be revised as requested, and the last sentence will be updated to reflect that the data will be incorporated into an Addendum.
69	82	A. Darpinian	USACE-KCD	4.5	4-38	Additional samples were collected on August 12, 2011. Identify the number, type, and location of samples; for example, 24 surface soil samples were collected from right-of-ways on New Market and Kenneth streets.	Document will be revised as requested.
70	66	A. Mason	USACE-KCD	5	5-1	References are included for the LBG/MP Site Safety and Health Plan (2011b) and the NJDEP 2005 Field Sampling Procedures Manual but these references are not included in the text of the report.	Applicable sections of the document will be reviewed to determine if material from these documents is included. If so, the references will be added to the text. If not, the references will be removed from the Reference Section.
71	67	A. Mason	USACE-KCD	5	5-1	Reconcile the date discrepancy between the USEPA, 2003 reference in Section 5 and the places in the text that use a reference of USEPA, 2004.	See response to Master Comment No. 25.
72	68	A. Mason	USACE-KCD	RW1 through RW-8		The data points (both black font and red font) appear to be shown in bold font and are hard to read (blurry) when printed out.	Document will be revised as requested.
73	69	A. Mason	USACE-KCD	RW1 through RW-8		The labels on the historical soil sample locations are too small to read.	Document will be revised as requested.
74	70	A. Mason	USACE-KCD	Property 201 through 307		Font on sample labels is hard to read when printed due to bolding. Adjust font settings.	Document will be revised as requested.

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75	71	A. Mason	USACE-KCD	Property 201 through 307		Delete Historical excavation areas from legend if not applicable to figure. Also delete explanation of diluted and original sample from legend if not applicable to figure.	Document will be revised as requested.
76	72	A. Mason	USACE-KCD	Property 203		Verify location of 203-07. Appears to be plotted beyond property line for Property 203.	The location of the point will be checked. It should be noted that the property lines utilized from the previous CAPE are not accurate; the point is likely plotted correctly but shows up outside of the property due to the inaccuracy of those boundaries.
77	73	A. Mason	USACE-KCD	Property 220		Duplicate sample for 220-06S exceeded ROD criteria, but primary sample did not. Primary sample result was plotted on figure. Need to determine whether duplicate result should be plotted in this case since it exceeded ROD criteria.	Since we are not calculating an average for the duplicate samples, if one sample of a duplicate pair exceeds the ROD criterion and one does not, the higher value should be shown. This change will be made on the specified figure.
78	74	A. Mason	USACE-KCD	Property 227 & Table 227-1		There is result value plotted for Sample 227-03D, but this sample result is not included in Table 227-1.	Document will be revised as requested.
79	75	A. Mason	USACE-KCD	Property 307		Label the circular feature on the Property 307 Figure.	Document will be revised as requested.
80	76	A. Mason	USACE-KCD	Table 110-1 through 307-2		Page numbers were included for ROW tables but not property tables. Revise for consistency	Document will be revised as requested.
81	77	A. Mason	USACE-KCD	Table 303-1		Sample 303-06D and 303-09D are out of order in the table.	Document will be revised as requested.
82	78	A. Mason	USACE-KCD	Table 306-1		Sample 306-03D is out of order in the table.	Document will be revised as requested.
END OF COMMENTS							